

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Douglas Stephen Taylor
Debtor 1
Noelle Denise Taylor
Debtor 2

Chapter 13

Case No. 1:22-BK-00900-HWV

Matter: Motion for Termination of Wage Attachment Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Douglas Stephen Taylor and Noelle Denise Taylor, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

1) Debtor(s) filed a Chapter 13 Petition on or about May 13, 2022.

2) Debtor 1 receives regular income from employment with Mayor & City Council of Baltimore which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.

3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: June 30, 2025

/s/ Douglas Stephen Taylor

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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Order

ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS
HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should
immediately cease the wage attachment in the amount of **\$517.38** from each **bi-weekly** paycheck.

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, June 30, 2025, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Mayor & City Council of Baltimore
Attn: Payroll Department
100 Holliday Street
Baltimore, MD 21202

Via Electronic Means
Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo US Courthouse
1501 North Sixth Street, 3rd Floor
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire